

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary  
For their Federally Enforceable State Operating Permit (FESOP)  
Perfection Spring & Stamping Corp.  
Mount Prospect, Illinois

Site Identification No.: 031198AAU  
Application No.: 11080052

Schedule

Public Comment Period Begins: August 8, 2014

Public Comment Period Closes: September 7, 2014

Illinois EPA Contacts

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## **I. INTRODUCTION**

Perfection Spring & Stamping Corp. has applied for a Federally Enforceable State Operating Permit (FESOP) for its custom metal stamping facility located at 1449 East Algonquin Road, Mount Prospect, Cook County, Illinois. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

Perfection Spring & Stamping Corp. manufactures custom metal stamping, fourslide parts, springs, wireforms, and mechanical assemblies for the automotive industry. The operation is comprised of one natural gas-fired stress relief oven, and two punch presses that have the capability of spraying vanishing oil on to metal substrates. The spray pumps for each punch press are recirculating pumps that spray vanishing oil onto the metal substrates. The excess oil drips off the substrate and is collected in a reservoir that feeds the recirculating pumps. The reservoir is manually refilled on an as needed basis. The emission units at this plant that require an operating permit include punch presses, recirculating pumps and stress relief oven. These units are sources of emissions because volatile organic material (VOM) generated from spraying and heating the varnish oil.

## **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source is requesting to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

#### **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. 35 Ill. Adm. Code 215.204(k)(2) specifies the volatile organic material allowed in coating materials for heavy off-highway vehicle product, and 35 Ill. Adm. Code 215.301 specifies limits of organic material discharge into the atmosphere from any emission source. The application shows that the plant is in compliance with applicable state emission standards.

#### **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. As explained, the varnish spraying is subject to 35 Ill. Adm. Code 218.301, which limits volatile organic materials into the atmosphere. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

The permit conditions would require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

#### **VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for this permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.